

Exhibit A

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

NOTICE OF CERTIFICATION OF CLASS OF UFC FIGHTERS

If you competed in one or more live professional UFC-promoted MMA bouts taking place or broadcast in the United States from December 16, 2010 to June 30, 2017 (the “Class Period”), you could be affected by the Court’s Class Certification Decision and Order. Please read this notice carefully.

A federal court directed this Notice. This is not junk mail, an advertisement, or a solicitation from a lawyer.

- On August 9, 2023, the Honorable Richard F. Boulware, II of the United States District Court for the District of Nevada, entered an order in a class action lawsuit called *Cung Le, et al. v. Zuffa, LLC d/b/a Ultimate Fighting Championship and UFC*, Case No. 2:15-cv-01045-RFB-BNW (the “Action”), certifying the following class (the “Bout Class”): “All persons who competed in one or more live professional UFC-promoted MMA bouts taking place or broadcast in the United States from December 16, 2010 to June 30, 2017. The Bout Class excludes all persons who are not residents or citizens of the United States unless the UFC paid such persons for competing in a bout fought in the United States.”
- The Action was brought by six professional UFC fighters, including Cung Le, Nathan Quarry, Jon Fitch, Brandon Vera, Luis Javier Vazquez, and Kyle Kingsbury (“Plaintiffs”), on behalf of themselves and a class of similarly situated professional UFC Fighters. The Action alleges that Defendant Zuffa LLC, d/b/a Ultimate Fighting Championship and UFC (the “UFC” or “Defendant”) used anticompetitive conduct to establish and maintain its dominance in the market for Elite Professional MMA services. The alleged conduct included, among other things, (a) entering exclusive contracts with UFC fighters that effectively blocked the vast majority from fighting for rival MMA promotions, and (b) acquiring rival promotion companies and locking up their MMA fighters into exclusive contracts, and (c) coercing fighters into long-term exclusivity with the UFC (together, the “Scheme”). The Action further alleges that the Scheme enabled the UFC to injure members of the Bout Class by artificially suppressing their bout pay. Plaintiffs seek to recover from Defendant in this Action money damages reflecting the amount Plaintiffs claim that members of the Bout Class were underpaid due to the alleged Scheme. Plaintiffs also seek injunctive relief to stop Defendant from continuing to engage in the alleged anticompetitive conduct.
- Defendant denies Plaintiffs’ allegations and any wrongdoing. Defendant asserts that through its efforts to grow MMA and the UFC, Defendant has consistently increased the number of events that it promotes and the compensation paid to fighters who participate in its MMA bouts. Defendant contends that Plaintiffs’ claims lack merit and that its conduct was *pro-competitive, not anticompetitive*: (a) Defendant’s acquisitions of other MMA promotion companies helped grow the MMA industry by efficiently allocating resources and did not result in the improper foreclosure of competitors, as evidenced by new market entrants and the continued growth of rival MMA promotion companies; (b) Defendant’s exclusive contracts with UFC fighters did not foreclose a substantial share of the market for MMA fighter services and were, in fact, pro-competitive because they were supported by legitimate business justifications; and (c) Defendant did not “coerce” fighters to sign long-term exclusive contracts with the UFC, but rather hired the best fighters—who want to fight in the UFC—to help its business grow and re-signed those fighters to contracts of greater or equal value to those offered by other MMA promotions, none of which is anticompetitive according to Defendant.
- The Court has not decided which side is correct. The Court has scheduled a jury trial to begin on April 8, 2024.

- You are a member of the Bout Class certified by the Court if you competed in one or more live professional UFC-promoted MMA bouts taking place or broadcast in the United States from December 16, 2010 to June 30, 2017. The Bout Class excludes all persons who are not residents or citizens of the United States unless the UFC paid you for competing in a bout fought in the United States during the Class Period.
- Please read this Notice carefully. Your legal rights will be affected whether you act or do not act. You now have to make a choice. This Notice describes the portion of the Action that is continuing and how you can continue in that Action or exclude yourself from that Action. Additional information about this Action can be found at www.UFCFighterClassAction.com.
- You must take action to exclude yourself from the Bout Class if you do not wish to participate in the Action against the Defendant. If you would like to remain in the Bout Class, you need not do anything at this time.
- The Court has approved the following firms as counsel for the Bout Class:

Eric L. Cramer
Michael Dell'Angelo
BERGER MONTAGUE PC
1818 Market St., Suite 3600
Philadelphia, PA 19103

Benjamin Brown
Richard Koffman
Daniel H. Silverman
COHEN MILSTEIN SELLERS &
TOLL, PLLC
1100 New York Ave., N.W.
Suite 500, East Tower
Washington, D.C. 20005

Joseph Saveri
JOSEPH SAVERI LAW
FIRM, LLP
601 California St., Suite 1000
San Francisco, CA 94108

SUMMARY OF YOUR LEGAL RIGHTS AND OPTIONS

If you are a member of the Bout Class, your legal rights and options are described in this section. You may:

DO NOTHING	<p>Remain in the Bout Class. You have the right to continue participating in the Action as a Bout Class Member. You do not need to take additional action to remain in the Class or be a part of the Action against the Defendant.</p> <p>If you remain a Bout Class member, you will retain the possibility of receiving money or other benefits from the Defendant that may come from trial or settlement in the Action. By remaining in the Bout Class, you will be bound by the outcome of the Action, and you will give up your right to file your own lawsuit covering the same or similar claims as in the Action. There is no money available now from the Defendant and there is no guarantee that there will be any in the future. The outcome of the Action against the Defendant is not yet known.</p> <p>You may receive other notices from the Court when there are other important developments that may require you to make a decision or take action. However, if you stay in the Bout Class at this time, you may not have another opportunity to request exclusion (or opt-out) of the Action, and you will be unable to pursue claims against the Defendant that are being litigated in this Action separate from the Bout Class.</p>
EXCLUDE YOURSELF FROM THE BOUT CLASS	<p>Opting out of the Bout Class is the only way you can file or continue your own lawsuit concerning the legal claims or issues in this Action.</p> <p>If you exclude yourself from the Action, you will receive no payment from the Defendant arising out of the Action, even if any monies are collected in the Action as the result of a trial or settlement.</p> <p>You will remain in the Bout Class unless you submit a written request to exclude yourself as described in Question 12, below. You must submit a timely written request by January 22, 2024 to exclude yourself from the Bout Class, if you wish to do so.</p>

This chart provides summary information about the Action. The remainder of this Notice is designed to provide more information to help you evaluate your options and answer any questions that you may have.

This Notice explains your legal rights and options—and the deadlines to exercise them.

- This is not a lawsuit against you.
- This notice summarizes your rights to participate or exclude yourself from the Action against the Defendant.
- The outcome of the Action against the Defendant is not yet known. If you opt to remain in the Bout Class, you will be notified if money or other benefits are obtained from the Defendant through settlement or trial.
- For additional information, visit www.UFCFighterClassAction.com or call toll-free 1- 866-955-5564. You may also write to the Class Action Administrator by mail: UFC Fighter Class Action, c/o Class Action Administrator, 1650 Arch Street, Suite 2210, Philadelphia, PA 19103, or email: info@UFCFighterClassAction.com.

**PLEASE DO NOT TELEPHONE THE COURT OR THE COURT CLERK'S OFFICE TO INQUIRE
ABOUT THIS NOTICE**

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BASIC INFORMATION

1. Why did I receive this Notice?

You have received this Notice because records show you may have competed in one or more live professional UFC-promoted MMA bouts taking place or broadcast in the United States from December 16, 2010 to June 30, 2017 (the “Class Period”).

Bout Class members have the right to know about the Court’s certification of a litigation class (the “Bout Class”) to pursue class action claims against the Defendant. You also have the right to continue in the Action as a member of the Bout Class or to exclude yourself from the Bout Class. If you continue as a member of the Bout Class, which you may do by doing nothing now, your interests in this Action will be represented by Court appointed Class Counsel and you will be bound by the results in the Action, and be able to benefit from any judgment or settlement of the Action.

If you wish to exclude yourself from the Bout Class, you must send a written request for exclusion by January 22, 2024 by following the instructions in Question 12. If you exclude yourself from the Bout Class, you will not be able to benefit from any settlement or cash award in this Action.

2. What is this lawsuit about?

The lawsuit alleges that Defendant used an anticompetitive scheme to establish and maintain its market dominance, which allegedly allowed it to pay its fighters substantially less than it would have paid in a more competitive market during the Class Period in violation of federal antitrust law. The Defendant denies these claims and any allegation of wrongdoing, and asserts several defenses, including that there is ample competition in the market for MMA fighters, that its conduct was pro-competitive, and that UFC continually and substantially increased fighter pay over the Class Period. The Honorable Richard F. Boulware, II of the United States District Court for the District of Nevada is overseeing the Action. The Judge has not decided which side is correct.

To obtain more information about the claims in the Action you can view the complaint and other important court documents in this case at www.UFCFighterClassAction.com.

3. Why is this a class action, and who is involved?

In a class action lawsuit, one or more people called “Named Plaintiffs” or “Class Representatives” sue on behalf of other people who have similar claims. The people with similar claims together are a “Class” and each is called a “Class Member.” In a class action, the court resolves the issues for all Class Members, except for those who exclude themselves (or “opt-out”) of the Bout Class.

4. Is there money available?

No money or benefits are available now because the Court has not decided the merits of the Plaintiffs’ claims or Defendant’s defenses, the jury trial has not yet occurred, and the Parties have not settled the case. There is no guarantee that money or benefits will be obtained. If money or benefits become available either by way of settlement or if the Plaintiffs prevail at trial or through legal motions, Bout Class Members may have to take additional steps, such as submitting a claim form or providing other evidence, in order to determine whether they are eligible to recover any money or benefits. In that event, you will be notified of whatever additional steps, if any, you must take. You can learn more details, and stay informed of the progress of the Action, by visiting www.UFCFighterClassAction.com.

WHO HAS THE RIGHT TO PARTICIPATE IN THE CLASS ACTION LAWSUIT?

5. Am I a Bout Class Member who is part of the ongoing class action lawsuit against the Defendant?

Fighters who fought for the UFC are members of the Bout Class if they meet the following definition:

All persons who competed in one or more live professional UFC-promoted MMA bouts taking place or broadcast in the United States from December 16, 2010 to June 30, 2017. The Bout Class excludes all persons who are not residents or citizens of the United States unless the UFC paid such persons for competing in a bout fought in the United States.

On August 9, 2023, the Honorable Richard F. Boulware, II of the United District Court for the District of Nevada entered an order certifying the Bout Class. See ECF No. 839. The Court has not decided either the merits of the Plaintiffs’ claims or Defendant’s defenses. The Court has scheduled a jury trial in the Action to take place in April 2024.

6. I am still not sure if I am included?

If you received this Notice, it is because you were listed as a potential Bout Class Member. If you are still not sure whether you are included, you can contact the lawyers representing the Bout Class (*see* Question 9) or the Class Action Administrator (*see* Question 16).

7. Are there exceptions to being a Bout Class Member?

Yes. Excluded from the Bout Class are persons who are not residents or citizens of the United States, unless the UFC paid such persons for competing in a bout fought in the United States during the Class Period.

8. What are my rights as a Bout Class Member?

You have the right to continue participating in the Action as a Bout Class Member. You do not need to do anything at this time to remain in the Bout Class or be a part of the Action against the Defendant.

If you do not exclude yourself from the Bout Class and thus remain a Bout Class Member in the Action against the Defendant, you will retain the possibility of receiving money or other benefits from the Defendant that may come from trial or settlement. By remaining in the Bout Class, you will be bound by the outcome of the Action with the Defendant, whether it is favorable or unfavorable, and you will give up your right to file your own separate lawsuit with regard to any of the claims asserted or issues decided in this Action. There is no money available now from the Defendant, and there is no guarantee there will be any in the future. The outcome of the Action against the Defendant is not yet known. If money or other benefits are obtained from the Defendant, you will be notified at that time.

You also have the right to exclude yourself from the Bout Class, in which case you would preserve any right you may have to bring or continue a lawsuit of your own against the Defendant for the same or similar claims against the UFC, but you would give up the right to receive any payment that could result from trial or a potential settlement in this Action against the Defendant.

THE LAWYERS REPRESENTING THE BOUT CLASS

9. Who represents the Bout Class in this case?

The Court appointed the following law firms as Co-Lead Class Counsel (also referred to as “Plaintiffs’ Counsel” or “Class Counsel”) to represent the Bout Class:

Eric L. Cramer	Benjamin Brown	Joseph Saveri
Michael Dell’Angelo	Richard Koffman	JOSEPH SAVERI LAW
BERGER MONTAGUE PC	Daniel H. Silverman	FIRM, LLP
1818 Market St., Suite 3600	COHEN MILSTEIN SELLERS &	601 California St., Suite 1000
Philadelphia, PA 19103	TOLL, PLLC	San Francisco, CA 94108
	1100 New York Ave., N.W.	
	Suite 500, East Tower	
	Washington, D.C. 20005	

Class Counsel has been prosecuting this Action, i.e., overseeing and performing work to advance the case on behalf of the Plaintiffs and the Bout Class since before it was filed in December 2014.

10. Should I get my own lawyer?

You do not need to hire your own lawyer because Class Counsel is working on your behalf. If you want your own lawyer, you may hire one, but you will be responsible for any payment for that lawyer’s services. For example, you can ask your lawyer to appear in Court for you if you want someone other than Class Counsel to

speak for you. You may also appear for yourself without a lawyer.

11. How will the lawyers be paid?

If there is a settlement or judgment against the Defendant, Class Counsel would file a motion to the Court requesting attorneys' fees and reimbursement of costs and expenses. If the Court awards these payments, they will be paid from any settlements or recoveries. You personally do not have to pay any of Class Counsel's fees, costs, or expenses.

EXCLUDING YOURSELF FROM THE BOUT CLASS IN THE ONGOING CLASS ACTION LAWSUIT

12. How do I opt-out of the Bout Class in the Action against the Defendant?

If you fall within the Bout Class definition but do not want to be included in the Action against the Defendant for any reason, including because you want to retain the right to sue the Defendant for the same or similar claims as in the Action, then you must request exclusion (or opt out) of this Action. The deadline for requesting exclusion from the Action is **January 22, 2024**.

To exclude yourself, you must submit a written request for exclusion that includes the following information:

- The name of the Lawsuit: Cung Le, et al. v. Zuffa, LLC d/b/a Ultimate Fighting Championship and UFC, Case No. 2:15-cv-01045-RFB-BNW (D. Nev.).
- Your name and current address;
- Your personal signature; and
- A statement clearly indicating that (a) you are a member of the Bout Class, and (b) you wish to be excluded from the Bout Class in the Action.

Your request for exclusion must be mailed via the U.S. Postal Service to the address below so it is **postmarked** no later than **January 22, 2024**.

UFC Fighter Class Action
ATTN: Exclusion Request
PO Box 58220
Philadelphia, PA 19102

By electing to be excluded: (1) you will not share in any potential recovery that might be obtained by the Bout Class as a result of trial, legal motion, or settlement in the Action; (2) you will not be bound by any decision in the Action that is either favorable to the Bout Class or favorable to the Defendant; and (3) you may present any claims you have against the Defendant by filing your own lawsuit.

You cannot exclude yourself (opt out) by telephone or email.

13. If I do not exclude myself, can I sue the Defendant for the same or similar thing later?

No. If you are a Bout Class Member, unless you exclude yourself from the Bout Class, you give up the right to sue the Defendant on your own with respect to any of the claims asserted or issues decided in the Action as more fully described in Question 12 above.

14. If I exclude myself from the Bout Class, can I get money from the Action?

No. If you exclude yourself from the Bout Class, you will not be eligible to receive a share of any money recovered from the Defendant in the Action either by trial or settlement. But, by excluding yourself from the Bout Class, you keep any rights to sue on your own with respect to any of the claims asserted or issues decided in this Action should you wish to do so.

IF YOU DO NOTHING

15. What happens if I do nothing at all?

If you are a Bout Class Member and you do nothing, you will remain a member of the Bout Class and be represented by Class Counsel. By remaining a member of the Bout Class, you will retain the possibility of receiving money or other benefits from the Defendant that may come from trial or settlement. You will also be bound by the outcome of the Action with the Defendant, and you will give up your right to file your own lawsuit with the same or similar claims as in the Action. There is no money or other benefits available now from the Defendant and no guarantee there will be any in the future. The outcome of the Action against the Defendant is not yet known. If money or other benefits are obtained from the Defendant you will be notified.

GETTING MORE INFORMATION

16. How do I get more information?

For more detailed information about the Action, including being able to determine whether you are a member of the Bout Class, please refer to the dedicated website: www.UFCFighterClassAction.com.

If you have additional questions, you may contact the Class Action Administrator by email, phone, or mail:

Email: info@UFCFighterClassAction.com.

Toll-Free: 1-866-955-5564

Mail: UFC Fighter Class Action
c/o Administrator, 1650 Arch St, Ste 2210
Philadelphia, PA 19103

Publicly-filed documents can also be obtained by visiting the office of the Clerk of the United States District Court for the District of Nevada or reviewing the Court's online docket.

PLEASE DO NOT WRITE OR CALL THE COURT OR THE CLERK'S OFFICE FOR MORE INFORMATION